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Development Department
Alvin P. Solis, AICP
Director

June 7, 1999

Please reply to:
Nick Yovino
(559) 498-1593

Gina Francis, Senior Staff Analyst
Fresno County Public Works and
Development Services Department
2220 Tulare Street, Sixth Floor
Fresno, California 93721

Dear Ms. Francis:

SUBJECT: CITY OF FRESNO'S COMMENTS ON THE NOTICE OF PREPARATION
FOR THE ENVIRONMENTAL IMPACT REPORT FOR THE COUNTY OF
FRESNO'S GENERAL PLAN UPDATE

This letter is the City of Fresno's response to the Notice of Preparation for the environmental impact report for the General Plan Update. The county has stated that it is their intent to prepare the environmental documents for the General Plan, concurrently with the General Plan Update itself, in what has been described as an "iterative process". Of concern, however, is that without the ability to review and respond to critical pieces of information, and the Draft General Plan Update itself, the city's comments on the Notice of Preparation are limited to broad-based issues.

It is the city's understanding, based on representations made by county staff and the General Plan consultant, that the City of Fresno will be included in all on-going dialogue, discussions, workshops, and other meetings as the county develops the General Plan and that the city will continue to have the opportunity to provide additional comments in advance of the release of the draft plan and draft EIR for its formal public review and comment period.

The city cautions, however, that because of the iterative process being used by the county, there may come a point in which a new Notice of Preparation may be required as the result of the project substantially changing.

The City of Fresno respectfully offers the following comments:

- At present, Fresno County's General Plan designates substantial area to the west and east of the City of Fresno as "rural residential". The continuation of this land use designation, and allowing the further creation of 2.5- to 5.0-acre parcels is not consistent with the implementation of the "Landscape of Choice" document prepared by the Growth Alternatives Alliance. The rural residential development is an impediment to the city's ability to increase urban densities as desired, thereby causing the further conversion of agricultural land; and, does not provide for the logical extension of public services and utilities. Should the rural residential designations be continued, the EIR for the General

Plan Update will need to describe the adverse environmental effects, including but not limited to increased conversion of agricultural land, continued land use conflicts, greater air emissions related to increased vehicle trip lengths, inconsistency with adopted land use plans, and other related effects.

Therefore, the city recommends that the rural residential designation be replaced with the Limited Agricultural designation, and zoned to the AL-20 (Limited Agricultural: 20-acre minimum parcel size) zone district.

- The county's General Plan Update and EIR need to recognize and support the economic development strategies of the City of Fresno.
- The existing Urban Referral Policies of the General Plan need to be reviewed and updated to include the referral of all land use entitlements for potential annexation. Of particular concern, is that at present, certain development may be allowed by the county to locate within the city's Sphere of Influence that may not be consistent with the city's adopted land use plans. Development within the city's Sphere of Influence needs to be deferred until the city can annex and service said development. Should county development continue to be allowed to occur within the Sphere of Influence, the EIR needs to address the adverse environmental effects that would occur, including but not limited to inconsistency with adopted land use plans and adverse effects on the provision of public services and utilities.
- The General Plan Update and EIR need to recognize that land uses allowed by the county outside the city's Sphere of Influence may still have an impact on city transportation, sewer, water, and other services. Associated impacts related to degrading air quality and loss of agricultural lands also need to be addressed. County urban development outside the city's Sphere of Influence could also affect the city's ability to implement its plans; this needs to be addressed.
- The General Plan Update and EIR need to reaffirm and support the planning efforts related to the San Joaquin River corridor, including designating property as Open Space and Agriculture. Should the General Plan Update propose development within the river corridor, the EIR will need to address those effects.
- A primary task in the county's General Plan Update is the assignment of anticipated population growth to the incorporated cities. However, this information was not available to the city at the time these N.O.P. comments were due. Therefore, the allocation of population and any assumed demographic profiles need to be coordinated with the City of Fresno prior to its use in the General Plan Update and EIR.
- Although an alignment has not been selected for the proposed high-speed rail corridor, the Circulation Element of the General Plan Update and EIR need to discuss the range of alternatives under consideration

- The city recommends that the county's zoning ordinance be reviewed for consistency with the proposed land use designations and policies of the county's General Plan Update.

If you should have any questions, please contact Nick Yovino, Deputy Development Director, 559/498-1593.

Sincerely,

DEVELOPMENT DEPARTMENT

A handwritten signature in black ink, appearing to read 'Alvin P. Solis', written over the typed name.

Alvin P. Solis, Director

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